

IN the UNITED States District Court

For the District of Delaware

Emanuel H. Jones

Plaintiff

v.

Officer Norris and
New Castle County
Police Department
Defendants

Civil Action No.

06-674-SLR



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RENEW Appointment
of Counsel Motion

1. The Defendants is Not Responding To My Motion For Requesting Discovery For Trial, if Counsel was appointed here she know how to handle this matter without a problem.

2. I would like to have appointment of Counsel For trial in this civil matter cause I do not have Trial Experience and Counsel can do a Better job at handling this case and presenting My Medical Records and also The Evidence and Witness Statement at Trial

3. Also this Institution will Not Release My Medical File to me, they will only Release it to my lawyer So I'm asking the Court to appoint Counsel For this Matter also cause I Need my medical File For trial cause it will show all the Medication I've Been takin, all the doctor Reports and all Reports about My Back pains.

4. This civil action is in Need of high degree Trial Experience and Counsel that can present the case correctly or do a Better job than me in conducting discovery (Especially depositions), Negotiating a Settlement meritorious claims and performing the other difficult Tasks of litigation, By virtue of Experience and of Not Being locked up in the defendants' custody. When the availability of post deprivation Remedies satisfies due process are often so complex as to Require the assistance of Counsel I also have extreme difficulty in grasping the legal Issues in this case to Support appointment of Counsel, I'm takin Medication For depression and this is a Mental disability For me that it would Be Very difficult For me to present this case at trial.

5. The defendants are completely UNcooperative in Responding to My discovery Requests.

6. I Really Need Help with this case this is a Very difficult case that's in need of Experience cause I'm Not a Jailhouse lawyer and some time I have people to help me sometimes I don't and I need some one that can Really help me and Represent this case the Right way and that can present the Facts clearly.

Sincerely yours

Emanuel H. Jones
SBI # 557338

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